

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**In re: Ethicon, Inc., Pelvic Repair System**     )  
**Products Liability Litigation**                 )     **MDL No. 2327**  
\_\_\_\_\_ )

**THIS DOCUMENT RELATES TO: ALL CASES**

**JOINT MOTION FOR SHOW CAUSE APPLICABLE  
TO ALL CASES WHY THE COURT SHOULD NOT ENTER A STIPULATED  
ORDER DISMISSING CERTAIN COOK DEFENDANTS  
FROM ALL CASES WITHOUT PREJUDICE**

Co-Lead Counsel for Plaintiffs and Lead Counsel for Defendants Cook Incorporated, Cook Biotech Incorporated, and Cook Medical Incorporated (collectively referred to as the “Cook Defendants”) respectfully request that the Court issue an Order to Show Cause why the Court should not enter an Order dismissing without prejudice Cook Group Incorporated, Cook Ireland, Ltd., Cook (Canada), Inc., William A. Cook Australia, Pty., Ltd., and Vance Products Incorporated d/b/a Cook Urological Incorporated (collectively referred to as the “Additional Cook Defendants”) from all cases filed in MDL Nos. 2187, 2325, 2326, 2327, 2387, and 2440 as set forth in the proposed Order attached hereto as **Exhibit A**.

Following negotiations between Co-Lead Counsel for Plaintiffs and Lead Counsel for the Cook Defendants, the parties reached an agreement on the language of the proposed Order. In accord with other MDLs pending before the Honorable Court, the parties now file the instant motion.

For the foregoing reasons, Co-Lead Counsel for Plaintiffs and Lead Counsel for the Cook Defendants respectfully request that the Court enter the Order attached hereto as **Exhibit A**.

This the 18<sup>th</sup> day of December, 2013.

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 18<sup>th</sup>, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Erin K. Copeland

Erin K. Copeland